

**FAEGRE DRINKER BIDDLE &
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Epsilon Data Management, LLC,
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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION,
*as assignee of individuals who are Covered
Persons*, JANE DOE-1, *a law enforcement
officer*, JANE DOE-2, *a law enforcement
officer*, EDWIN MALDONADO, SCOTT
MALONEY, JUSTYNA MALONEY,
PATRICK COLLIGAN, PETER
ANDREYEV, and WILLIAM SULLIVAN,

Plaintiffs,

vs.

EPSILON DATA MANAGEMENT, LLC,
CONVERSANT LLC, CITRUS AD
INTERNATIONAL, INC., RICHARD ROES
1-10, *fictitious names of unknown individuals*
and ABC COMPANIES 1-10, *fictitious names
of unknown entities*,

Defendants.

ECF Case

Civil Action No. 3:24-cv-04168

Removed from:

Superior Court of New Jersey
Law Division, Monmouth County
Docket No. MON-L-533-24

**RULE 7.1 CORPORATE DISCLOSURE
STATEMENT**

Pursuant to Federal Rule of Civil Procedure 7.1(a)(1), Defendants Epsilon Data Management, LLC, Conversant LLC, and Citrus AD International, Inc. hereby state as follows:

Conversant LLC is a limited liability company organized under the laws of the State of Delaware with its principal place of business in Chicago, Illinois. Conversant's sole member is Epsilon Data Management, LLC.

Epsilon Data Management, LLC is a limited liability company organized under the laws of the State of Delaware with its principal place of business in Irving, Texas. Epsilon's sole member is MMS USA Holdings, Inc.

Citrus AD International, Inc., is a Delaware corporation with its principal place of business in Florida. Citrus AD International is a wholly owned subsidiary of MMS USA Holdings, Inc.

MMS USA Holdings, Inc. is incorporated in Delaware with its principal place of business in New York, New York. MMS USA Holdings, Inc.'s ultimate parent company is Publicis Groupe S.A., which is a publicly held corporation.

Respectfully submitted,

Dated: March 25, 2024

/s/ Ross A. Lewin

Ross A. Lewin

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-and-

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CERTIFICATE OF SERVICE

I, Ross A. Lewin, hereby certify that on March 25, 2024, I caused a true and correct copy of the foregoing Rule 7.1 Corporate Disclosure Statement to be electronically filed with the Clerk of the District Court using the CM/ECF system, and to be served upon the following counsel of record for Plaintiffs via email and Federal Express:

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/s/ Ross A. Lewin

Ross A. Lewin